

KOH

LBG/TPW: USAO 2019R00718

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DAVID ANNOR and
LESLEY ANNOR,

Defendants

CRIMINAL NO. **GJH 20CR446**

(Conspiracy to Commit Money
Laundering, 18 U.S.C. § 1956(h);
Forfeiture, 18 U.S.C. § 982(a)(1) &
(b)(2), 21 U.S.C. § 853(p), 28 U.S.C.
§ 2461(c))

INDICTMENT

COUNT ONE

(Conspiracy to Commit Money Laundering)

The Grand Jury for the District of Maryland charges that:

Introduction

At times relevant to this Indictment:

1. Defendants **DAVID ANNOR** ("DAVID") and **LESLEY ANNOR** ("LESLEY") were citizens of Ghana.
2. **DAVID** and **LESLEY** were brothers residing in Montgomery County, Maryland.
3. **DAVID** was the registered agent of Ravid Enterprise LLC ("Ravid Enterprise"), a company located in Gaithersburg, Maryland, that was registered by **DAVID** in the State of Maryland.
4. "Drop Accounts" were bank accounts opened or controlled by **DAVID**, **LESLEY**, and their conspirators that were used to receive money from victims. The following accounts, among others, were Drop Accounts:

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DISTRICT OF MARYLAND
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Name on Account	Financial Institution	Last Four Numbers on Account
David Annor	SunTrust	4114
David Annor	Wells Fargo	5030
David Annor	Capital One	6797
David Annor	Citibank	5998
David Annor	M&T Bank	9528
David Annor	M&T Bank	5105
David Annor	JP Morgan	3771
David Annor	JP Morgan	7281
David Annor	BB&T	2885
David Annor	BB&T	4392
Lesley Annor	SunTrust	5477
Lesley Annor	Wells Fargo	4653
Lesley Annor	BOA	5957
Lesley Annor	TD Bank	0580
Lesley Annor	TD Bank	3415
Lesley Annor	BB&T	9581
Lesley Annor	JP Morgan	3520
Ravid Enterprise	PNC Bank	9109
Ravid Enterprise	SunTrust	4312
Ravid Enterprise	TD Bank	1021
Ravid Enterprise	TD Bank	1357

5. In internet-based romance scams, criminals found their victims on social media platforms, including (among others) Facebook, Match.com, Words with Friends, and Smule, to initiate romantic relationships with elderly individuals, for the purpose of obtaining money through fraud. Criminals typically used phone conversations, emails, internet chat messenger services, and text messages to form romantic relationships with victims. Criminals then used a number of false stories and promises to convince victims to deliver money to the members of the conspiracy to pay for, among other things, fake hospital bills, fake plane trips to visit victims, and fake problems with overseas businesses. Criminals caused the victims to deposit, wire, or transfer money to the Drop Accounts. Criminals also caused the victims to mail cash or cashier's checks that the criminals would later deposit into the Drop Accounts.

6. Criminals involved in internet-based romance scams often have their Drop Accounts closed as a result of suspicious activity. Once their Drop Accounts are closed, criminals involved in internet-based romance scams open new Drop Accounts at other financial institutions and continue to receive and deposit money from victims into those new Drop Accounts.

The Conspiracy

7. Between in or about 2017 and in or about November 2020, in the District of Maryland and elsewhere, the defendants,

**DAVID ANNOR and
LESLEY ANNOR,**

did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to commit an offense against the United States, in violation of 18 U.S.C. § 1956, to wit:

a. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, to wit, wire fraud in violation of 18 U.S.C. § 1343, with the intent to promote the carrying on of such specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, to wit, wire fraud, in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership,

and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means

It was part of the conspiracy and scheme to defraud that:

8. **DAVID, LESLEY**, and their co-conspirators opened and/or managed the Drop Accounts in order to receive millions of dollars into those accounts from fraud victims.

9. **DAVID, LESLEY**, and their co-conspirators caused victims of fraud schemes to use the wires to transfer money to the Drop Accounts.

10. **DAVID, LESLEY**, and their co-conspirators caused victims of fraud schemes to deposit money directly into the Drop Accounts.

11. **DAVID** created and registered Ravid Enterprise for the purpose of setting up Drop Accounts to receive money from victims of fraud schemes.

12. **DAVID, LESLEY**, and their co-conspirators sent and received e-mail communications with evidence of the deposits victims made into the Drop Accounts.

13. **DAVID** and his co-conspirators deposited the money received from victims in the mail into the Drop Accounts.

14. **DAVID, LESLEY**, and their co-conspirators disbursed the money received from victims to other Drop Accounts in the United States and Ghana, all to promote wire fraud and other criminal conduct, and to hide true ownership and disguise the nature, source, and control of those assets.

18 U.S.C. § 1956(h)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 982(a)(1) and (b)(1), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), as a result of the defendants' convictions under Count One of the Indictment.

Money Laundering Forfeiture

2. Upon conviction of the offense charged in Count One of this Indictment, the defendants,

**DAVID ANNOR and
LESLEY ANNOR,**

shall forfeit to the United States, pursuant to 18 U.S.C. 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property, including but not limited to, a forfeiture money judgment of at least \$5,000,000 in U.S. currency, and the following property:

- a. \$7,281.36 from JPMorgan Chase account ending in x3520 seized on or about November 13, 2020;
- b. \$1,872.79 from TD Bank account ending in x5709 seized on or about November 13, 2020; and
- c. \$181.14 seized from PNC Bank account ending in x5049 seized on or about November 13, 2020.

Substitute Assets

3. If, as a result of any act or omission of any of the defendants, any of the property described above as being subject to forfeiture,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C.

§ 982(b)(1) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

18 U.S.C. § 982(a)(1) & (b)(1)

21 U.S.C. § 853(p)

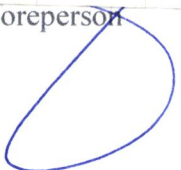
28 U.S.C. § 2461(c)

Robert K. Hur 
Robert K. Hur
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson



Date:

12/9/20